

FPS:lm

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

-vs-

NO. 3:CR-06-385

SHAWN ISOM a/k/a "Cuda"  
PAUL LAW a/k/a "Paul Lawson"  
NICOLE DAVIS  
MARK SLEBODA,  
HERBERT GRAHAM a/k/a "JR,"

Defendants

FILED  
SCRANTON

NOV 27 2007

PER  DEPUTY CLERK

**SECOND SUPERSEDING INDICTMENT**

THE GRAND JURY CHARGES:

**Count 1**

From in or about November 2004 to the present, in Lackawanna County, Pennsylvania,  
within the Middle District of Pennsylvania, and elsewhere, the Defendants,

**SHAWN ISOM a/k/a "Cuda"**  
**PAUL LAW a/k/a "Paul Lawson"**  
**NICOLE DAVIS**  
**MARK SLEBODA**  
**and**  
**HERBERT GRAHAM a/k/a "JR,"**

did knowingly, intentionally combine, conspire, confederate and agree with each other, and  
others known and unknown to the Grand Jury, to commit the following offense against the  
United States, namely to knowingly, intentionally and unlawfully distribute and possess with  
intent to distribute in excess of 1 kilogram of heroin and marijuana, Schedule I controlled  
substances, a violation of Title 21, United States Code, Section 841(a) (1) and 841(b)(1)(A).

**Manner and Means of the Conspiracy**

The manner and means by which the defendants and their co-conspirators sought to accomplish the objectives of the conspiracy included, among others, the following:

1. The defendants and/or their co-conspirators would obtain the controlled substances from suppliers in New Jersey.
2. After the controlled substances were obtained, the defendants and/or their co-conspirators would transport the controlled substances to Lackawanna County, Pennsylvania, and distribute the controlled substances to others located in Lackawanna County, Pennsylvania, in return for money or other valuable consideration.
3. The defendants and/or their co-conspirators established and utilized drug storage and distribution locations in the Lackawanna County, Pennsylvania area.
4. The defendants and/or their co-conspirators possessed and carried firearms to protect their drug distribution locations and activities.

All in violation of Title 21, United States Code, Section 846.

**THE GRAND JURY FURTHER CHARGES:**

**Count 2**

On or about January 18, 2006, in Lackawanna County, Pennsylvania, within the Middle District of Pennsylvania, the Defendant,

**SHAWN ISOM a/k/a "Cuda,"**

aided and abetted by another person, and aiding and abetting another person, did knowingly, intentionally and unlawfully possess with intent to distribute heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a) (1), and Title 18, United States Code, Section 2.

**THE GRAND JURY FURTHER CHARGES:**

**Count 3**

On or about January 18, 2006, in Lackawanna County, Pennsylvania, within the Middle District of Pennsylvania, the Defendant,

**SHAWN ISOM a/k/a "Cuda,"**

aided and abetted by another person, and aiding and abetting another person, did knowingly, intentionally and unlawfully possess with intent to distribute marijuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a) (1), and Title 18, United States Code, Section 2.

**THE GRAND JURY FURTHER CHARGES:**

**Count 4**

On or about January 18, 2006, in Lackawanna County, Pennsylvania, within the Middle District of Pennsylvania, the Defendant,

**SHAWN ISOM a/k/a "Cuda,"**

did knowingly use, possess and carry a firearm, namely an AK47 rifle, model number NHM91, serial number 9203651, during and in relation to, and in furtherance of, a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, the knowing and intentional possession with intent to distribute heroin, a violation of 21 U.S.C. Section 841(a)(1).

All in violation of Title 18, United States Code, Section 924 (c).

**THE GRAND JURY FURTHER CHARGES:**

**Count 5**

On or about January 18, 2006, in Lackawanna County, within the Middle District of Pennsylvania, the defendant,

**SHAWN ISOM a/k/a "Cuda,"**

having been convicted in court of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting commerce, firearms, namely, an AK47 rifle, model number NHM91, serial number 9203651, and a .32 caliber Clerke Technicorp revolver, serial number 092008.

In violation of Title 18, United States Code, Section 922(g)(1).

THE GRAND JURY FURTHER CHARGES:

Count 6

From in or about April 2006 through on or about May 22, 2006, in Lackawanna County, Pennsylvania, within the Middle District of Pennsylvania, the Defendant,

**PAUL LAW a/k/a "Paul Lawson,"**

did knowingly, intentionally and unlawfully possess with intent to distribute heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a) (1).

A TRUE BILL:

DATE

11/27/07

  
GRAND JURY FOREPERSON

Martin C. Carlson F.T.S.  
MARTIN C. CARLSON  
Acting United States Attorney